

**REMARKS**

Claims 19-25 are pending in this application.

Claims 19-25 are rejected.

The office action dated July 5, 2006 indicates that base claim 19 is rejected under 35 USC §103(a) as being obvious over Sullivan U.S. Publication No. 2003/0093320 in view of documents describing the Nokia IP330 (an integrated firewall/router that offers RealSecure firewall intrusion detection, VPN, anti-virus, and content filtering).

Base claim 19 has been amended. Amended base claim 19 recites a secure transaction system that utilizes a public network. The system comprises a plurality of servers connected to the public network for providing a public web-based tax service that allows merchant subscribers to accumulate tax information. Different functions of the tax service are performed by different servers. The system further comprises means for providing security for information on the servers and information during transmission over the public network between the servers.

Sullivan discloses a tax compliance transaction system 200 that receives transaction data from sellers and purchasers, and calculates tax liability information (paragraph 0005). Sullivan states the system 200 includes one or more processors that are centralized (see paragraph 5, line 7; paragraph 69, line 1; paragraphs 124-127; and Figure 1). The system 200 described at paragraph 124-127 is implemented in a personal computer.

Sullivan does not teach or suggest that different tax functions are performed by different servers. Sullivan's system 200 can be implemented over multiple computers that are connected via a computer network (paragraph 130,

lines 3-8). Paragraph 130 states that different “configurations of computers in a network permit many users to participate in a transaction, even if they are disbursed geographically.” Paragraph 131 states modules shown in the figures can be implemented on different computers. However, it does not specify which modules. Paragraph 130 suggests that these modules relate to the users, so they can participate from different geographic locations.

Moreover, Sullivan does not describe a means for providing secure transmission of information between computers. Sullivan uses password access to prevent unauthorized sellers and purchases from gaining access to the system 200 (paragraph 40). However, the password access does not protect transmitted data after an authorized user has lawfully gained access. For example, it does not protect transmitted data against eavesdropping, connection hijacking, network-level virus attacks, etc.

The documents describing the Nokia IP330 do not teach or suggest the differences between Sullivan’s system and the system of claim 19. The documents do not teach or suggest that Sullivan’s different tax functions could be performed by different servers.

Moreover, the documents describing the Nokia IP330 firewall do not teach or suggest a security means for a public service such as a public tax service. The Nokia firewall uses a private communication network (VPN), which is not well-suited for a public service.

Thus, the cited documents do not teach or suggest the tax transaction system of claim 19. Accordingly, the ‘103 rejection of amended claim 19 and its dependent claims 20-25 should be withdrawn.

The ‘103 rejection of claim 23 should be withdrawn for the additional reason that the cited documents do not teach or suggest a security means that

use PKI-2 way authentication (see <http://en.wikipedia.org/wiki/Vpn>, which provides a brief description of VPN). Suffice to say, the cited documents do not teach or suggest the combination of “a tiered architecture, PKI 2-way authentication and authorization, HTTPS post, with XML document and SSH for remote administration” for providing security for information on the servers and information transmitted between the servers.

For the reasons above, the ‘103 rejection of claims 19-25 should be withdrawn. The examiner is encouraged to contact applicants’ attorney Hugh Gortler to discuss any issues that might remain.

Respectfully submitted,

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